

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
W. R. GRACE & CO., et al.,¹)
Reorganized Debtor.) Case No. 01-01139 (AMC)
) (Jointly Administered)
)
) Re: Docket Nos. 929655, 929657, & 33305
)

**CERTIFICATE OF NO OBJECTION REGARDING REORGANIZED DEBTOR'S
MOTION TO APPROVE SETTLEMENT AGREEMENT RESOLVING STATE OF
MONTANA'S REMAINING CLAIM 18496-1**

PLEASE TAKE NOTICE that on January 10, 2023, the Reorganized Debtor filed the *Reorganized Debtor's Motion to Approve Settlement Agreement Resolving State of Montana's Remaining Claim 18496-1* [Docket No. 929655] (the "Motion"), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801. As stated in the notice of Motion, the deadline by which objections to the Motion were to be filed was 4:00 p.m. ET, March 21, 2023 (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that attached as Exhibit A to the Motion was a proposed form of Order Approving Settlement Agreement Resolving State of Montana's Claim for Operating Unit 3 of the Libby Asbestos Superfund Site (the "Proposed Order"). Certain pages of the Settlement Agreement (the "Settlement Agreement"), which was attached as the Exhibit to the form of Proposed Order were inadvertently omitted from the filing. On February 2, 2023, the Reorganized Debtor filed the Notice of Filing of Settlement Agreement Resolving State of

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining “Reorganized Debtor,” and Case No. 01-1139 is the sole remaining open chapter 11 case.

Montana's Remaining Claim 18496-1 [Docket No. 929657], to which was attached a complete copy of the Settlement Agreement and its attachments.

PLEASE TAKE FURTHER NOTICE that on March 21, 2023, prior to the Objection Deadline, the State of Montana's Response in Support of Reorganized Debtor's Motion to Approve Settlement Agreement Resolving State of Montana's Remaining Claim 18496-1 [Docket No. 33305] was filed in support of entry of the Proposed Order in the form attached to the Motion, which is the same as the form attached hereto.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby certifies that, as of the date hereof and except as set forth above in this Notice, the Reorganized Debtor has received no answer, objection or other responsive pleading to the Motion. The undersigned further certifies that the Court's docket in the above-captioned chapter 11 case has been reviewed, and except as set forth above in this Notice, no answer, objection, or other responsive pleading to the Motion appears thereon.

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The Reorganized Debtor therefore requests that the Court enter the proposed Order attached hereto as Exhibit A at the Court's earliest convenience.

Dated: March 23, 2023

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